# Exhibit 3

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**Complex Disputes** 

## CURRICULUM VITAE – SECURITIES AND CLASS ACTION LITIGATION

#### Angus F. Ni – Attorney

Mr. Ni founded AFN after practicing commercial litigation and arbitration at Debevoise & Plimpton LLP, followed by securities class action litigation at Bernstein Litowitz Berger & Grossmann LLP—the top plaintiffs' shareholder litigation firm in the country. Mr. Ni has handled complex litigation throughout his career, including over a dozen class actions with securities, commodities, and antitrust components for both plaintiffs and defendants, as well as numerous other commercial disputes.

#### **Education:**

The University of Chicago Law School, J.D. with Honors. University of Toronto, Trinity College, B.A. with High Distinction, College Scholar.

#### Sampling of Securities Litigation And Class Action Experience

- Representing a U.S. listed Chinese education company in a securities class action alleging failure to disclose known regulatory risks in the wake of the Chinese government's mid-2021 announcement of a new regulatory regime on the private education industry. (*Dagan Investments LLC v. First High-School Education Group Co., Ltd. et al* 1:22-cv-03831-JGK (S.D.N.Y.))
- Representing investors in a class action brought to rescind a 2021 "Initial DEX Offering" of a stable coin and governance token pair. (*Shomroni v. Fei Labs, Inc. et al.* CGC-22-598995 (Sup. Ct. Cal.))
- Representing investors in a class action brought to rescind a 2018 "Initial Coin Offering" in the first-ever Washington State Securities Act claim in the cyptocurrency space. (*Hunichen v. Atonomi LLC et al.* 2:19-cv-00615-RAJ (W.D.Wash.))
- Obtaining the voluntary dismissal of a shareholder litigation against NYSE-listed Chinese agricultural fertilizer manufacturer after filing motion to dismiss, and within 30 days of appearing in the action. (*Little v. China Green Agriculture, Inc. et al.*, Case No. 2:19-cv-01756-JCM-NJK (D.Nev.))
- Represented investors in a class action pursuant to the federal securities laws against a California-based cryptocurrency company that raised more than \$1 billion in an unregistered offering of cryptocurrency in 2017. (*In Re Tezos Securities Litigation*, Case No. 3:17-cv-06779. (N.D. Cal.))

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- Defending a formerly NASDAQ-listed China-based cellphone contract design-and-manufacturing company in a securities class action alleging fraud pursuant to the PSLRA filed in the Eastern District of New York. (*Thomas v. China Techfaith Wireless Communication Technology Limited et al.*, Case No. 1:19-cv-00134-FB-CLP. (E.D.N.Y))
- Defending a NYSE-listed Chinese fertilizer manufacturer in shareholder lawsuits before the Southern District of New York. (*Chen v. China Green Agriculture Inc.*, Case No. 1:20-cv-09232-MKV (S.D.N.Y.)).
- Represented a China-based private investment fund in a first-of-its kind Delaware Chancery Court action concerning the application of 8 *Del. C.* § 242(a)(4) to corporate charter amendments. (*Kala International Investment Co., Ltd. vs Centrexion Therapeutics Corporation*, Case No. 2019-0517-JTL (Del. Ct. Ch.)).
- Represented a German investment fund against Wells Fargo in a securities fraud action arising from Wells Fargo's fake accounts scandal. (*Hefler et al v. Wells Fargo & Company et al.* Case No. 4:16-cv-05479-JST (N.D.Cal.))
- Represented a U.S. pension fund against Pershing Square Capital Management and Valeant Pharmaceuticals in a first-of-its-kind Rule 14e-3 (Williams Act) insider trading class-action. (*Anthony Basile et al v. Valeant Pharmaceutical International, Inc. et al.* Case No. 8:14-cv-02004-DOC-KES (C.D.Cal.)).
- Represented a U.S. hedge fund against Salix pharmaceuticals in a PSLRA securities class action arising out of Salix's "channel stuffing" scheme. (*Woburn Retirement System v. Salix Pharmaceuticals, Ltd. et al.*, Case No. 1:14-cv-08925-KMW (S.D.N.Y.)).
- Represented a direct plaintiff in an opt-out action, opting out of the Luckin securities class action. (Ye v. Luckin Coffee, Inc. et al., Case No. 1:21-cv-02020-JPC (S.D.N.Y.)).
- Representing investors from around the world in a class action under the Securities Act against GTV Media Group Inc. and several other individuals and entities who conducted a multi-hundred-million-dollar unregistered securities offering. (*Zhengjun Dong et al v. GTV Media Group, Inc. et al.* Index No. 652190/2021 (New York County Supreme Court)).